

118 St. Francis Street
Redwood City, CA 94062
p-fwf@ziemba.us

September 5, 2018

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: WC Docket No. 18-141

Dear Commissioners:

I am strongly opposed to USTelecom's Petition concerning Unbundled Network Elements (UNEs).

I have spent over thirty years developing computer networking devices as an engineer and small business professional, and therefore am intimately familiar with the technology and its economics.

From 1995 to the present, the initial availability and then enormous growth of residential and commercial broadband internet was catalyzed by the requirement that incumbent telecoms make their infrastructure available to other network service providers, not only for last-mile connectivity to customers, but also for backhaul and other internal purposes.

Business consolidation among network service providers over the last fifteen years has reduced the quality and increased the cost of internet connectivity in my local area. I live in a densely-populated suburban area and have used competitive DSL for approximately eighteen years. Fiber optic connectivity to my neighborhood has only become available in the last several months, and yet limitations imposed by the incumbent provider (AT&T) make it unusable for my professional needs.

My discussions with friends and family in other cities and other US states reveals a similar lack of competition and lack of responsiveness on the part of incumbent providers, both in urban and non-urban areas. Competition in residential and commercial internet service IS STILL NEEDED.

In return for the wiring physical plant natural monopoly which occupies public and private land, hundreds of billions of dollars from depreciation tax writeoffs and deregulation starting in the 1990's and continuing today, incumbent telecoms should NOT ONLY be required to continue providing currently-mandated UNE access, they should FURTHER be required to provide UNE access to new network infrastructure such as fiber services.

Competitive POTS also deserves mention in this context. AT&T continues to gouge end users for trivially-provided features such as caller-id. Whereas these fees made sense in the 1960's when dedicated electronics were needed, the incremental cost of providing such features in software today is negligible. I use competitive POTS and believe it is needed in order to keep the excessive fees in check.

USTelecom's petition is a greedy attempt at consolidating oligopolistic power at the expense of residential consumers and small businesses. Please reject it.

Sincerely,

G. Paul Ziemba